

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 1:14-MJ-144 (JFA)</b>
	)	
<b>TIFFANY GARDNER,</b>	)	<b>Trial Date: August 5, 2014</b>
	)	
<b>Defendant</b>	)	
_____	)	

**DEFENDANT’S PROPOSED VOIR DIRE**

COMES NOW the Defendant, by and through counsel, Kevin Brehm, Assistant Federal Public Defender, and hereby respectfully requests that the following questions be included in the jury *voir dire*:

1. Have any of you, or a relative or very close friend, ever been arrested, convicted, or given a citation or ticket for driving under the influence or for possession of a drug? If so, would that experience make it difficult for you to be fair to the defendant in this case?
2. Have any of you, or a relative or very close friend, ever been harmed or injured by someone driving under the influence, or by someone using drugs? If so, would that experience make it difficult for you to be fair to the defendant in this case?
3. Have any of you, or a relative or very close friend, ever worked in law enforcement, including military police? If so, when and where? Would that experience make it difficult for you to be fair to the defendant in this case?

4. Do any of you believe that the testimony of a law enforcement officer, including a military police officer, is more credible than the testimony of any other witness?
5. Would any of you be prejudiced against the defendant because of the nature of the charges, such as driving under the influence or illegal possession of a drug?
6. Have you, or any of your relatives or very close friends, ever been a member of any organization that deals with issues related to driving under the influence, such as Mothers Against Drunk Driving (MADD)?
7. Have you, or any of your relatives or very close friends, ever received any form of treatment or counseling related to alcohol or drug use?
8. Have you, or any of your relatives or very close friends, ever worked or lived at the Marine Corps base at Quantico, Virginia?
9. Do you know, or think you might know, any of the following persons: John Bonnacarrere, Kevin George, or John Covey.
10. Have you ever served on a criminal trial jury or a grand jury before?

Respectfully submitted,

TIFFANY GARDNER

By Counsel,

Michael S. Nachmanoff,  
Federal Public Defender

By: \_\_\_\_\_/s/

Kevin Brehm  
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CERTIFICATE OF SERVICE

I hereby certify that on the 20<sup>th</sup> day of July, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jeffrey Tharp, Esquire  
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/s/

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